



Supplier Code of Conduct

Doc.ID	PWD-GEN-POL-0012		
Department	Author	Revision	Date
Legal	DVE / CSU	2.0	20-FEB-2024



Supplier Code of Conduct

February 2024

This Supplier Code of Conduct (“Code”) sets requirements for our business partners in strong business ethics and integrity, fully in line with the core values of Parkwind.

Suppliers shall conduct their business in compliance with all applicable laws and regulations and undertake any activities with the highest standards on quality, health & safety, security, environmental and social governance criteria.

Acknowledgement of this Code is a pre-requisite to any contract with Parkwind. Parkwind requests Suppliers to adhere to this Code or an equivalent Code agreed with Parkwind, when doing business with Parkwind. Suppliers shall have adequate management systems and controls in place to ensure compliance with this Code or its equivalent being proportionate to the size, complexity and risk environment of the Supplier’s business.



Parkwind Supplier Code of Conduct

Parkwind develops, finances, constructs, operates, maintains and monitors offshore wind farms with the goal of becoming the preferred green energy partner of communities, governments and suppliers. As a leading company in the development and generation of green and sustainable energy, Parkwind strives to be a socially responsible company and hence focusses on the management of quality, health & safety, security, environmental and social governance criteria in all Parkwind activities.

Given the importance of suppliers¹ (“Suppliers” or “Supplier”) in the overall supply chain of Parkwind, it is pivotal for an effective management of the quality, health & safety, security, environmental and social criteria, that those Suppliers in turn also adhere to the principles as set out in the Code by Parkwind. In addition, Suppliers are expected to take sufficient measures to ensure that their respective suppliers and sub-contractors in relation to their activities for Parkwind also adhere to the minimum standards as depicted in the Code or by a code that offers at least a similar level of protection compared to the Parkwind Code.

In general, it should be clear that, as a minimum level, Suppliers should comply with the applicable regulatory framework at any time (e.g. relevant laws, principles, regulations, permits, ...). The standards of the Code are in addition to, and not in lieu of these provisions or in lieu of any legal agreement or contract between Suppliers and Parkwind, unless that agreement or contract specifically states otherwise. In the event the principles as set out in the Code contradict the relevant regulatory framework, the highest standards should apply (insofar this is allowed for under the relevant regulatory framework). In the event the relevant regulatory framework prohibits the application of the higher standard as depicted in the Code, the Supplier shall promptly inform Parkwind.

Parkwind expects its Suppliers to recognize and adhere to internationally accepted principles and frameworks such as (but not limited to) the OECD Guidelines for Multinational Enterprises and UN Guiding Principles for businesses and Human Rights. These include the principles and rights set out in the eight fundamental conventions identified in the ILO Declaration on Fundamental Principles and Rights at work, and the International Bill of Human Rights.

This Code does not purport to be an exhaustive list of conduct rules. More detailed and/or specific rules may apply in relation to activities, projects and/or specific regions and can be included in specific agreements in this respect.

The conduct rules are centralised in separate pillars: (i) the principles aimed at the protection of people, (ii) the principles aimed at the protection of the environment, (iii) the principles on ethical business operations, and (iv) compliance. Furthermore, the Code defines principles for monitoring adherence, principles of communication and consequences in the event of non-compliance.

¹ The concept of supplier entails all parties that (in)directly perform services or deliver goods to Parkwind and other business partners of Parkwind, including their affiliated entities, employees and all other people working on behalf of the supplying entity.



Protecting people

Suppliers are required to undertake appropriate actions to avoid causing, contributing or being linked to any form of violation of human rights, including respect for indigenous people, minorities and other vulnerable group's rights.

The principles are applicable to all people engaged by the Supplier and include employees, self-employed people, temporary, migrant, student and contract workers, ...

Hence Suppliers commit themselves to:

1. Promote inclusion, equal opportunities and non-discrimination

Parkwind considers diversity as an asset. Therefore, Suppliers shall support diversity and offer equal opportunities to everyone. Business decisions, whether internal (e.g., hiring, evaluation, promotion, compensation, termination) or external (e.g., selection & control of suppliers and/or (sub)contractors), must be based solely on criteria such as training, competency & experience, merit, potential, and objective and non-discriminatory business considerations.

In the event of such a business decision, the Supplier should be able to evidence that the decision is based on objective and non-discriminatory arguments upon the request of the person(s) involved.

Suppliers shall ensure that everyone is treated fairly and with respect and shall not tolerate any form of discrimination e.g., (non-exhaustive) on the grounds of race, colour, gender, language, religion, political opinions, nationality, social background and status, union membership, age, health status or disability, pregnancy, sexual orientation, ...

In addition, Suppliers shall endeavour to promote diversity within their organisation and take positive actions in this respect (e.g., elimination of wage gaps, promoting women in leadership roles, inclusion of people with different ethnical and cultural backgrounds, providing facilitating accommodations for persons with disabilities, ...)

Suppliers shall safeguard the right of workers and other stakeholders to freedom of thought, opinion and the expression thereof, within reasonable boundaries (e.g., discrimination, war propaganda, hatred of any kind, ...), the right to participate in public life (e.g., voting, being elected, ...).

Suppliers shall ensure that workers and other stakeholders are treated equally before the law, receive equal protection and shall not be subject to discrimination of any sort.

2. Promote health, safety and employee wellbeing

Suppliers shall ensure they have adequate health and safety measures implemented to ensure that "no one gets hurt, nothing is damaged and all risks are actioned, controlled and managed".

Like Parkwind, Suppliers shall ensure that they adhere to the highest health and safety standards on locations where work is performed and on locations where Suppliers provide housing to workers (when applicable). In this respect the local regulatory framework to prevent accidents and injury in combination with the relevant health and safety plans and policies and emergency preparedness and response plans and policies as developed by Parkwind or its subsidiaries (or any similar governance documents from the Supplier that ensure at least an equivalent level of protection) serve as a minimum level of protection to be guaranteed by the Supplier.



Suppliers shall ensure they have a framework of training & competency measures in place to ensure that their staff and the staff of their respective suppliers and sub-contractors can work safely with respect to both their physical and mental health. For those activities that entail specific risks, designated precautionary measures should be taken. Suppliers shall provide workers with all safety gear required to duly and safely complete an operation.

Moreover, we expect our Suppliers to continuously monitor and improve the working conditions and environment of their staff.

In addition, the health and safety of the surroundings of a construction site should also be taken into account. In this respect, Suppliers should adhere to the principles to protect the communities in the proximity of the construction site from physical safety risk arising from construction, O&M and decommissioning works.

3. Promote social performance

Suppliers shall conduct their business in a socially responsible manner, acting as an ethical and responsible employer or business partner, and shall in this respect pay specific attention to:

Excluding child and forced labour

Suppliers should refrain from all forms of forced labour.

Forced or child labour, (modern) slavery, servitude or any other form of exploitation shall never be tolerated. Notwithstanding the local regulatory framework, suppliers working with Employees or otherwise engaged staff members that are younger than 18 years of age must ensure adherence to the ILO's Minimum Age Convention of 1973 (No. 138).

Any person younger than 18 years of age, that is employed in line with the local legislation and the principles as set out above, shall receive additional guidance and protection. This additional guidance and protection entail the exclusion for types of work which are likely to have a negative impact on the safety, health, morals or education or those types of work that entail specific risks for physical and mental wellbeing.

In no event shall workers be restricted in their freedom of movement (e.g., through retention of passports and identity documents).

All people employed in the framework of a Parkwind project should receive an induction prior to initiating the work. During the induction, the people concerned should be provided with a handbook that includes an introduction to workers' rights as per the applicable laws and workplace rules and regulations.

Written contracts

Suppliers shall provide all people they employ with written contracts depicting the respective rights and obligations of both the Supplier and the worker. In addition, Suppliers shall ensure that workers understand their respective rights and obligations by providing additional information on a need basis.

Workers should receive a written overview of the policy statements on standard working hours, overtime, rotation, limits on time at sea, and maximum number of working hours permitted.

The above is applicable to all workers that are hired directly by a contractor, recruited through a labour broker or by any other means.



Freedom of association

Suppliers shall recognize and respect the right to freedom of association, as well as any other legally protected workplace rights. In the event the right to freedom of association is restricted in certain countries, Suppliers should allow for alternative forms of worker association.

No discrimination can be made based on the choice to associate or not to associate or on the choice to act as a worker representative.

Preventing and prohibiting harassment and abuse

Suppliers ensure that all workers are treated with dignity and respect. Behaviour, abuse, threats, or any other form of harassment vis-à-vis workers or business partners, whether verbal or physical, which are or can be perceived as humiliating, intimidating, hostile or violent (including racial, religious, or national hatred) shall not be tolerated.

Suppliers shall install designated reporting mechanisms to allow people employed to report any such behaviour in a confidential manner.

Remuneration, working hours, leave and working conditions

Suppliers shall ensure full compliance as regards domestic provisions and collective agreements on minimum wages, working time, overtime wages, sick leave, ...

Suppliers will verify that the number of hours worked for each employee on a weekly basis does not materially exceed the maximum number as set in the relevant regulatory framework and that the employees are granted sufficient rest between operations to ensure a healthy work-life balance (taking into account the right of the workers and other stakeholders to a family life).

Supplier shall respect the right to an adequate standard of living and shall take appropriate actions to ensure the adequate living of employees. This right includes the right to adequate food, clothing and housing (when applicable).

Disciplinary measures and fair trial

Disciplinary actions are allowed in the event they are included in the written agreements and explicitly understood by workers. Disciplinary actions shall in no event consist of corporal punishment, detention and loss of liberty, harassment of physical, sexual, psychological, verbal or any other form of abuse nor monetary fines.

In addition, any disciplinary action shall be recorded and communicated to the worker (including the motivation) in writing. Suppliers ensure a right to fair trial, both during the disciplinary actions and during any legal procedures. Workers should have the option to appeal against disciplinary actions and have the case assessed by an independent third party.

Protecting the environment and resilience to climate change

Given Parkwind's focus on green and sustainable energy, Parkwind expects its Suppliers to manage their operations to minimize the risks for the environment. Business operations should make efficient use of water and energy and should have a minimal impact on biodiversity and ecosystems in place. Suppliers shall have a structured and systemic approach to handling environmental aspects in their



undertakings. This includes establishing appropriate management procedures to improve environmental performance, setting targets and performing regular reviews in this respect.

Adhering to the regulatory framework

As a minimum, Suppliers should comply with the highest standards of the national / local regulatory framework and the international rules and principles on the preservation and protection of the environment. In any case, Suppliers shall ensure that all required permits and licenses are obtained in due time, that no work is initiated prior to the granting of those permits and licenses and that all conditions to such permits and licenses are fulfilled (and remain fulfilled during the entire period of operations).

Notwithstanding the local regulatory framework, the Suppliers shall endeavor to avoid or reduce any harmful emissions or waste, on land, air and water as a result of their operations and will make all necessary efforts to ensure the resilience of their operations and infrastructure to physical climate change such as natural disasters. In this respect the Suppliers engage themselves to:

1. Continuously monitor the use of resources and materials to ensure an efficient use thereof, using environmentally friendly alternatives when possible taking into consideration cost-benefit parameters.
2. Communicate on the use of potentially hazardous materials to ensure that risks for Health, Safety and Environment can be mitigated to the maximum extent. When using potentially hazardous materials, Suppliers ensure that they are used in a safe manner and that they are properly cleaned up, re-used or recycled after the respective activities.
3. Install a procedure to enable stakeholders to gather information on the impact of the operations on the environment and for stakeholders to file complaints on the potential adverse consequences of the operations.
4. Ensure negative environmental impacts are avoided or mitigated. In cases where avoidance or mitigation is not possible appropriate compensation of all relevant stakeholders shall be ensured.
5. Consider and promote resilience of its operations and infrastructure to natural disasters such as floods, rising sea levels and any other climate related phenomenon that may occur in the short or long term.

Ethical business practices

1. Conflicts of interest

Suppliers shall take sufficient measures to avoid conflicts of interest, whether actual, potential or perceived as it might compromise their credibility within Parkwind or third parties' confidence in Parkwind.

2. Conflict-affected areas and conflict minerals

Suppliers shall independently, continuously and at their own initiative assess whether their operations, including the sourcing of materials, take place in conflict-affected areas or relate to conflict minerals.



Should the assessment indicate that there is a likelihood that the activities might be related to a conflict area / mineral, additional due diligence procedures should be in place to ensure that the Supplier is in no way linked to armed actors who might benefit from the revenues generated by the Supplier.

This includes ensuring that products do not entail conflict minerals (e.g. minerals from conflicted mines, or minerals that (in)directly fund conflict areas).

3. Zero tolerance on corruption, bribery and money laundering

Corruption and bribery are serious criminal offences. Suppliers shall have a zero-tolerance policy, on any form of (direct or indirect) corruption or bribery. Suppliers shall not offer or accept any benefits to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips or services and amenities of any other nature. Suppliers shall not engage in or tolerate any form of money laundering.

Suppliers should have procedures and internal governance rules for prohibiting and preventing in practice that any employee or any person linked to the Supplier from undertaking any activity that in any way would give rise to an offence under the relevant regulatory framework.

In addition, Suppliers should have relevant procedures in place to avoid any appearance of, or association with, corruption, bribery or money laundering and should promptly inform Parkwind should such an appearance or association be possible.

4. Protection of intellectual property rights, data privacy and confidential information

In their cooperation with Parkwind, Suppliers might be granted access to trade secrets, know-how, personal data and other confidential information.

Suppliers shall safeguard confidential information provided by Parkwind and ensure that all employees' and business partners' privacy and intellectual property rights are protected.

In addition, Suppliers engage themselves to act in accordance with the applicable data protection laws, including GDPR and the Parkwind Privacy Policy. In this respect, Suppliers shall properly manage any information on employees or other stakeholders to its disposal as to avoid any impact on the right to privacy of the individuals concerned.

5. External communications

In the event a Supplier intends to include Parkwind in any external communication, both directly or indirectly, the Supplier shall promptly inform Parkwind hereof and shall check with Parkwind whether the intended communication depicts a coherent and correct image of Parkwind.

No external communication, referring to Parkwind should be made prior to the approval of Parkwind of the envisaged communication.



Compliance

1. Compliance with laws

Suppliers shall act with integrity in all aspects of their business activities, and ensure all activities in the framework of a Parkwind project are conducted in accordance with applicable international, national and regional laws and regulations.

Suppliers shall comply with applicable tax laws and regulations of countries in which they operate. This commitment extends to fostering a collaborative climate with tax authorities and ensuring ethical tax practices, thereby refraining from any involvement in or facilitation of tax evasion.

2. Fair competition

Parkwind supports transparent and competitive markets. Suppliers are to respect competition laws protecting fair competition and combatting illegal practices, e.g. price fixing, bid rigging, market allocation, anti-competitive or monopoly practices.

Implementation of adequate sustainability due diligence processes and procedures

Suppliers shall implement adequate due diligence processes in line with the UN Guiding Principles on Business and Human Rights. This means suppliers shall:

- Formally commit to respect the commitments of the Code or equivalent code agreed with Parkwind.
- Identify and assess actual and potential negative impacts related to items addressed by the Code.
- Systematically avoid and address negative impacts related to items addressed by the Code.
- Track effectiveness of their due diligence approach.
- Communicate on how impacts are addressed and formally report on severe risks.
- Provide remedy when causing or contributing to actual negative impacts and establish grievance mechanisms where individuals or groups can raise concerns about adverse impacts.

Grievances

Suppliers should establish appropriate grievance mechanisms available to personnel, interested parties and affected stakeholders to seek information, express opinions and report concerns or complaints concerning working conditions, the environment, business practices or any other topic associated with the Code of Conduct. The grievance mechanism should allow for workers and community members to submit grievances anonymously, and information held about those raising grievances must be managed in line with data privacy principles and the Parkwind Privacy Policy.

Suppliers will ensure that all complaints are dealt with in a confidential manner and will refrain from any adverse consequences towards the party that filed the complaint.



A designated procedure should be in place for dealing with harassment in a swift and thorough manner.

Checks and communications

To comply with the applicable rules of this Code and protect Parkwind's reputation, Suppliers are expected to allow Parkwind, or a third party authorized by Parkwind and reasonably acceptable to the Supplier, to conduct audits and/or a due diligence assessment of the Suppliers' operations relevant to this Code.

Aimed at full compliance with the Code, Parkwind may use following means to audit the efforts undertaken by the Supplier:

- A request for information consisting of a self-assessment file. The self-assessment file could list a number of questions allowing the Supplier to assess the efforts undertaken and to conclude on the compliance with the Code. The Supplier should timely and duly provide all answers and supporting information.
- A request for information consisting of specific information that allows Parkwind to assess whether the Supplier acts in accordance with the Code.
- An organised audit by an external third party.
- On-site audits by Parkwind.

In all cases, the Supplier will cooperate with Parkwind and provide all information to enable Parkwind or the third party to assess compliance with the Code.

Consequences in case of violations

Acknowledgement of this Code is a pre-requisite to any business relationship with Parkwind. In case of non-compliance with this Code, Parkwind may take any action it deems necessary to report and correct such non-compliance and reserves the right to suspend or terminate a business relationship. However, Parkwind recognizes that Suppliers may be at different stages of maturity implementing relevant practices and commits to working with Suppliers to achieve continuous improvement.